

THE CITY OF NEW YORK LAW DEPARTMENT

HON. SYLVIA O. HINDS-RADIX Corporation Counsel

100 CHURCH STREET NEW YORK, NY 10007 AMY ROBINSON Senior Counsel Tel.: (212) 356-3518 Fax: (212) 356-3509

arobinso@law.nyc.gov

July 11, 2022

BY ECF

Honorable Sanket J. Bulsara United States Magistrate Judge Eastern District of New York 225 Cadman Plaza East Brooklyn, NY 11201

Re: Diana Richardson, et al., v. City of New York, et al.

21-Civ-3609 (LDH) (SJB)

Your Honor:

I am Senior Counsel in the Office of the Honorable Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, and the attorney assigned to the defense of the above-referenced matter. Defendants respectfully request a two-week enlargement of time to answer or otherwise respond to the Amended Complaint from July 11, 2022, to July 25, 2022. A previous request for an enlargement of time to answer or otherwise respond to the Amended Complaint was made on May 27, 2022, (Dkt. No. 50) and was granted on June 16, 2022. The extension is necessary in order to finalize making representation decisions. Defendants apologize for the lateness of this request. Plaintiffs' position is as follows, "[w]e consent to this request but reiterate our objection to Defendants' practice of waiting until late on the day of a deadline (in this case, 7:38pm) to first request that we accede to extensions of court deadlines."

For the reasons stated herein, defendants respectfully request that the Court enlarge the time to answer or otherwise respond to the Amended Complaint to July 25, 2022.

Defendants thank the Court for its time and consideration of this request.

Respectfully submitted,

Amy Robinson |s|
Amy Robinson
Senior Counsel
Special Federal Litigation Division

cc: To All Plaintiffs Counsel via ECF